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RACII Lite 0569

Contract No. EP-S4-08-03

July 28, 2015

Scott Miller
U.S. EPA Region 4
61 Forsyth Street, 11th Floor
Atlanta, Georgia 30303

Subject: Response to July 27, 2015 Comments by Ofia Hodoh on Final (Revision 1) Human Health Risk Assessment, Smokey Mountain Smelters, Knoxville, Knox County, Tennessee – Task Order 019; Contract No. EP-S4-08-03

Dear Mr. Miller:

J.M. Waller Associates (J.M. Waller) is pleased to present our responses to Ofia's emailed comments on the July 2015 Final (Revision 1) Human Health Risk Assessment for Smokey Mountain Smelters. With your concurrence that these responses sufficiently satisfy Ofia's concerns, they will be incorporated into Revision 2 of this document.

If you have any questions or comments on this matter, please contact me.

Very truly yours,

Janice D. Austin, P.E.
Project Manager

Attachments

C: A. Ostrofsky – J.M. Waller
T. DeLong – Avatar Environmental

File: RACIILite-1987

Specific Comments:

1. Mercury should be included as a vapor intrusion COPC with a target groundwater VISL at 0.67 ug/L. Please revise the text in Section 5.4, and corresponding tables.

Response: Section 5.4 will be revised as follows (changed text is highlighted): As discussed previously in Section 2.5, shallow groundwater COPCs were screened against EPA Target Groundwater Concentrations (EPA, 2014d) to evaluate potential vapor intrusion concerns for future receptors. Maximum detected concentrations exceeded their respective Target Groundwater Concentrations for 1,2,4-trimethylbenzene, benzene, bromomethane, chloroform, ethylbenzene, mercury, naphthalene, tetrachloroethene, TCE, and cyanide. Ratios for 1,2,4-trimethylbenzene, benzene, bromomethane, and naphthalene were only slightly higher than 1.0 (1.2, 1.6, 1.8, and 1.4, respectively). Ratios for chloroform, ethylbenzene, tetrachloroethene, TCE, and cyanide were slightly higher with ratios of 11.2, 2.0, 3.1, 8.3, and 2.2, respectively. However, all of these exceedances are driven by concentrations from wells within the capped waste pile area (MW01A and MW02A). For mercury, the ratio is 14.3 based on the highest detected concentration in shallow monitoring well MW-010A, and 1.4 based on the highest detected concentration in deep monitoring well MW-07B. Neither of these wells is within 100 feet of a permanent structure. In the event that future development results in the construction of permanent structures within 100 feet of MW-010A or MW-07B, potential risks associated with possible exposure to mercury vapors evolved from groundwater should be revisited. When considered together, these results indicate that vapor intrusion in unlikely to be of concern at the SMS site. Site monitoring well locations relative to site source areas are presented on Figure 2-3.

2. Table 4R, please provide a brief explanation in the footnotes for the term "CT RSR", in the column under Potential ARAR/TBC Source.

Response: References to CT RSR were replaced with "NA" as there are no ARARs or TBCs associated with fish tissue. The replacement table will be numbered 4R-1.